

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re: ) IN CHAPTER 7 PROCEEDINGS  
 )  
ROBERT & JESSICA LEFFLER, ) BK 20-60264  
 )  
Debtor. )  
 )  
DONALD M. SAMSON, Trustee, )  
 )  
Plaintiff, )  
 )  
vs. ) Adv. 20-  
 )  
MONARCH LEGAL GROUP LLC )  
 )  
Defendant. )

**COMPLAINT FOR FRAUDULENT TRANSFER  
PURSUANT TO 11 U.S.C. §548 (a)(1)(B)**

The Complaint of Donald M. Samson, trustee, respectfully alleges:

1. That Donald M. Samson is the duly qualified and acting trustee in this case.
2. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C.

§1334 as a core proceeding pursuant to 28 U.S.C. §157(b)(2)(E). Venue properly lies in this judicial district pursuant to 28 U.S.C. §1409(a), in that the instant adversary proceeding is related to the above-captioned case under Title 11 of the United States code which is still pending.

3. On or about September 23, 2019 Robert & Jessica Leffler, debtors, entered into a Service Agreement with defendant Monarch Legal Group LLC. The Service Agreement provides for defendant to act as a debt settlement entity to negotiate and settle Robert & Jessica Leffler's unsecured debt with their creditors.

4. On or after the date of the Service Agreement, through the date of filing of their bankruptcy on October 15, 2020, Robert & Jessica Leffler paid to defendant in a series of payments a total of \$9,230.64 which was to be placed in a client savings account to be used to settle Robert and Jessica Leffler's unsecured debts to ten (10) creditors and pay fees to defendant.

5. From the transfer of \$9,747.00 paid to the defendant \$520.00 was paid to debtors' creditors, \$685.08 was refunded to the debtors and \$8,025.56 was retained by the defendant for fees and costs.

6. Debtors Robert & Jessica Leffler did not receive reasonably equivalent value for these transfers and at the time of the transfers were insolvent or became insolvent as a result of said transfers.

7. Said transfer is fraudulent as to the trustee and may be avoided by him pursuant to the provisions of 11 U.S.C. § 548(a)(1)(B).

WHEREFORE, the trustee prays for judgment in the amount of \$8,025.56.00 together with costs of suit incurred herein in the amount of \$350.00 and for such further relief as this Court deems just and equitable.

DATE: 03/04/22

/s/ Donald M. Samson  
DONALD M. SAMSON  
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